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## MEMO ENDORSED

Hon. Edgardo Ramos  
U.S. District Court Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

*Re: Case No. 24-cv-00156, Bell Semiconductor, LLC v. Broadcom Corp. et al.*

Dear Judge Ramos:

We represent Plaintiff Bell Semiconductor LLC in the above-captioned case. In accordance with Section 3 of Your Honor's Individual Practices, and on consent of the defendants, we respectfully request permission to file under seal our Memorandum of Law in Opposition to defendants' Motion to Dismiss.

Specifically, we seek to redact those portions of our Memorandum of Law that cite to or reveal information regarding confidential provisions of the parties' underlying agreement. As this Court is aware, this is a breach of contract action stemming from a patent assignment agreement between the parties. Section 8.1 of the assignment prohibits the parties from disclosing certain terms, which shall be kept "confidential."


This Court previously granted defendants permission to file under seal their moving memorandum of law in support of the motion to dismiss for the same reasons. (ECF No. 42.)

In short, and to comply with Section 8.1 of the assignment, we propose filing our Opposition Memorandum of Law with certain redactions, which are highlighted in the attached documents. The redacted text will be visible to all parties and to the Court, but not the general public.

Separately, under Rule 2(D) of Your Honor's Individual Practices, we respectfully request oral argument regarding defendants' Motion to Dismiss.

Thank you for your consideration of these requests.

Plaintiff's request to file their memorandum of law under seal is granted. Plaintiff is directed to file a redacted version for public view. SO ORDERED.

  
Edgardo Ramos, U.S.D.J.  
Dated: 5/31/24  
New York, New York

Respectfully submitted,

/s/ Adam Rodriguez  
Adam Rodriguez